

LAFAYETTE COUNTY

**FILED**

OCT 27 2023

JEFF BUSBY  
CIRCUIT CLERK

BY *[Signature]*, D.C.

**IN THE CIRCUIT COURT OF LAFAYETTE COUNTY, MISSISSIPPI**

**NICHOLAS SERVICES, LLC  
D/B/A NICHOLAS AIR and  
CORR FLIGHT S., INC.**

**PLAINTIFFS**

**VERSUS**

**CIVIL ACTION NO: L23-306**

**GLASSDOOR, INC. and  
JOHN AND JANE DOE(S) 1-30**

**DEFENDANTS**

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**PLAINTIFFS' MOTION FOR LEAVE TO FILE UNDER SEAL, OR IN THE  
ALTERNATIVE, MOTION FOR PROTECTIVE ORDER**

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COMES NOW, Plaintiffs, Nicholas Services, LLC d/b/a Nicholas Air and Corr Flight S., Inc., by and through counsel, and respectfully moves this Court for an entry of an Order granting Plaintiffs the right to file The Reviews, attached hereto in a sealed envelope as Exhibit "A", and the Confidentiality Agreement and Non-Disclosure Agreement ("Agreements") attached hereto in a sealed envelope as Exhibit "B" under seal, or in the alternative, for a Protective Order protecting The Reviews and Agreements from public disclosure<sup>1</sup>.

1. As Plaintiffs state in their Complaint, John and Jane Doe(s) 1-30 ("Doe Defendants") have authored false, defamatory, malicious, discriminatory and/or hateful reviews which disclose trade secret, confidential, proprietary, protected, and/or sensitive information regarding their alleged employment at Nicholas Air. GlassDoor, Inc. ("GlassDoor") then published The Reviews on their public website, and despite Plaintiffs' numerous attempts to have The Reviews removed, GlassDoor has continuously refused to remove The Reviews.

2. Plaintiff Nicholas Air is identified in the Reviews as Doe Defendants' former or current employer when it is not, in fact, an employer at all. Any additional publication of Reviews that

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<sup>1</sup> Due to their confidential nature, these Exhibits are not being provided to Defendants until further order of this Court.

*Lauren M. Byrd, DC*  
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November 29 2023



are known on their face to be patently false, whether in this lawsuit or otherwise, is unlawful and compounds damages to the trademark protected brand of Nicholas Air.

3. In their Complaint, Plaintiffs are seeking to have The Reviews removed as they are false, defamatory, malicious, discriminatory and/or hateful and disclose trade secret, confidential, proprietary, protected, and/or sensitive information. Any employment relationship between Plaintiff Corr Flight S., Inc and Doe Defendants requires Agreements which protect any and all business information from disclosure; the Reviews contain information that is contractually protected, and additional publication of the Reviews amplifies Plaintiffs breach of contract claims against Doe Defendants when damage could be mitigated by placing Reviews under seal.

4. Although The Reviews and Agreements are necessary to make a determination in this case, they should not become a matter of public record and should be shielded from disclosure to the general public.

5. Specifically, all mentions in The Reviews regarding work hours, overtime, compensation, benefits, safety, staffing, personnel, and any positions held by personnel, aircraft, contracts, bonuses, upgrades, communications and interactions within the course and scope of business operations, and the innerworkings of the company, are confidential and/or proprietary information which should not be available to the general public.

6. In addition to exposing trade secret, confidential, proprietary, and/or sensitive information, these reviews are also defamatory, hateful, and unduly and unnecessarily harmful to Plaintiffs and should not be a matter of public record.

7. Specific examples of this defamatory, hateful, and harmful language include comments about management, employees, the owner, Company beliefs and procedures, and how pilots and

other employees are treated and thought of. These comments should not be made available to the public.


8. The Agreements should also be protected from public dissemination as they are trade secret, confidential, and/or proprietary business information and give insight into the internal processes of the Company.

WHEREFORE, premises considered, Plaintiffs ask this honorable Court to enter an Order granting Plaintiffs the right to file The Reviews and Agreements under seal, or alternatively for a Protective Order protecting The Reviews and Agreements from public disclosure.

THIS the 27<sup>th</sup> day of October, 2023.

Respectfully submitted,

NICHOLAS SERVICES, LLC  
d/b/a NICHOLAS AIR, and  
CORR FLIGHT S., INC. *Plaintiffs*

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I, Hannah Katherine Herrin, attorney for the Plaintiffs, do hereby certify that I have this day forwarded a true and correct copy of the above and foregoing, excluding the Exhibits, via United States mail, postage prepaid to the following:

GlassDoor, Inc.  
300 Mission Street, 16<sup>th</sup> Floor,  
San Francisco, CA 94105

GlassDoor, Inc.'s Registered Agent, CT Corporation System  
330 N. Brand Blvd., Suite 700  
Glendale, CA 91203

THIS, the 27<sup>th</sup> day of October, 2023.



Hannah Katherine Herrin, Esq.